

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

HANA F. AL JADER

CR. NO. 05-10085-RCL

**AFFIDAVIT OF JEFFERY A. DENNER, ESQUIRE  
IN SUPPORT OF DEFENDANT'S MOTION FOR  
LEAVE TO CONDUCT AN EVIDENTIARY HEARING  
REGARDING EARLIER FILED DEFENDANT'S  
MOTION FOR ACCESS TO GOVERNMENT WITNESSES**

I, Jeffrey A. Denner, hereby depose and state under oath the following:

1. I am an attorney in good standing with the Bars of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts.
2. I am counsel for Hana F. Al Jader in the above-captioned case and, as such, I am familiar with the proceedings in this matter including defense counsel's attempts to investigate the allegations made against Ms. Al Jader and to prepare her a defense.
2. On or about November 15, 2006, I filed a Defendant's Motion for Reconsideration [of Defendant's Supplemental Memorandum of Law in Support Defendant's Motion for Access to Government Witnesses] and Defendant's Supplemental Memorandum of Law in Support of Defendant's Motion for Access to Government Witnesses.
3. To date, the Court has not decided either of these motions.

4. On information and belief, the government has taken affirmative steps to conceal the location of the complaining witnesses, Trimurniyati Dzalipa (referred to in the Indictment as "Tri") and Rohimah Bakri (referred to in the Indictment as "Ro"), and has instructed Tri and Ro not to contact Ms. Al Jader. See generally, Defendant's Supplemental Memorandum of Law in Support of Defendant's Motion for Access to Government Witnesses.
5. Despite my best efforts to locate Tri and Ro, I am unable to locate them.
6. As a result, I am unable to inquire of Tri and Ro whether they wish to speak with Ms. Al Jader and/or her counsel and to determine whether their decisions are made freely and without undue government influence.

Signed under the pains and penalties of perjury this 18th day of April 2006.

/s/

---

Jeffrey A. Denner